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11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 VPN.COM LLC,

Plaintiff,

14 vs.

15 GEORGE DIKIAN et al.

16 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

17 **STIPULATION AND ORDER TO**
18 **MODIFY SCHEDULING ORDER**

WHEREAS, on May 03, 2023, this Court granted the parties' first request to extend certain case deadlines, including non-expert discovery cutoff to August 04, 2023;

WHEREAS, the parties now jointly request a second extension of non-expert discovery cutoff to September 04, 2023, so that the parties can attempt to fully complete discovery obligations;¹

IT IS THUS STIPULATED AND AGREED, by and between the parties, through undersigned counsel, that the Scheduling Order be modified to the extent of extending non-expert discovery cutoff to September 04, 2023:

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Dated: August 04, 2023 By: /s/ Michael Cilento
Michael D. Cilento (*proc hac vice*)
Attorneys for Plaintiff

Dated: August 04, 2023 By: /s/ Mike Rodenbaugh
Michael L. Rodenbaugh (SBN 179059)
Attorneys for Defendant Dikian

¹ It should be noted that Plaintiff has requested a longer extension of fact discovery, and also an adjournment of the current trial date, due to the myriad of unresolved discovery disputes between the parties, which will be impossible to resolve in 30 days. Defendant would not agree to any further extension of discovery or any adjournment of the trial date. Plaintiff intends to submit a motion for such relief, which the parties met and conferred on, and which Defendant intends to oppose.